

PASSANISI Investigations

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January 11, 2021

CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARE
Not to be reproduced

United States Bankruptcy Court for the District of Delaware
824 Market Street, 3rd Floor
Wilmington, DE 19801

Re: TZEW Holdco LLC et al., Case No. 20-109-10 (CSS)

Dear Gentlepersons:

This is our objection in response to the Notice of Debtors' Motion to Convert Cases from Chapter 11 to Chapter 7 of the Bankruptcy Code in the matter of **TZEW Holdco LLC et al., Case No. 20-109-10 (CSS)**.

We conducted work for Apex Parks Group in 2019-2020 and have yet to be paid for the work that we conducted. Please find attached our proof of claim and the invoices for work that we completed and have yet to be paid for. We are owed \$1983.45 and object these cases being converted to Chapter 7, as that will delay or perhaps even void what we are owed.

Very truly yours,

Anthony J. Passanisi
Passanisi Investigations
AP/ro

Attachments

Proof of Claim
Invoices for work completed by Passanisi Investigations, Inc. for Apex Parks Group, LLC

Fill in this information to identify the case

Debtor 1 Passanisi Investigations, Inc.Debtor 2 N/A
(Spouse, if filing)

United States Bankruptcy Court for the: District of Delaware

Case number 20-10910

Official Form 410

Proof of Claim

04/19

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?

Passanisi Investigations, Inc.

Name of the current creditor (the person or entity to be paid for this claim)

Other names the creditor used with the debtor _____

2. Has this claim been acquired from someone else?

☒ No☐ Yes. From whom? _____

3. Where should notices and payments to the creditor be sent?

Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

Where should notices to the creditor be sent?

Passanisi Investigations, Inc.

Name

4228 18th Street

Number Street

San FranciscoCA94114

City

State

ZIP Code

Contact phone (415) 703-9888Contact email tony@passanisi.com

Where should payments to the creditor be sent? (if different)

Name

Number Street

City

State

ZIP Code

Contact phone _____

Contact email _____

Uniform claim identifier for electronic payments in chapter 13 (if you use one):

4. Does this claim amend one already filed?

☒ No☐ Yes. Claim number on court claims registry (if known) _____Filed on _____
MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?

☒ No☐ Yes. Who made the earlier filing? _____

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor? ☒ No
☐ Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: _____

7. How much is the claim? \$ 1,983.45 Does this amount include interest or other charges?
☒ No
☐ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.
 Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).
 Limit disclosing information that is entitled to privacy, such as health care information.
Professional investigations of a personal injury claim

9. Is all or part of the claim secured? ☒ No
☐ Yes. The claim is secured by a lien on property.
Nature of property:
☐ Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.
☐ Motor vehicle
☐ Other. Describe: _____
Basis for perfection: _____
 Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)
Value of property: \$ _____
Amount of the claim that is secured: \$ _____
Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.)
Amount necessary to cure any default as of the date of the petition: \$ _____
Annual Interest Rate (when case was filed) _____ %
☐ Fixed
☐ Variable

10. Is this claim based on a lease? ☒ No
☐ Yes. Amount necessary to cure any default as of the date of the petition. \$ _____

11. Is this claim subject to a right of setoff? ☒ No
☐ Yes. Identify the property: _____

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

☒ **No**

☐ **Yes. Check one:**

Amount entitled to priority

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

\$ _____

☐ Up to \$3,025* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

\$ _____

☐ Wages, salaries, or commissions (up to \$13,650*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

\$ _____

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

\$ _____

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

\$ _____

☐ Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.

\$ _____

* Amounts are subject to adjustment on 4/01/22 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☒ I am the creditor.

☐ I am the creditor's attorney or authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 05/12/2020
MM / DD / YYYY

Signature

Print the name of the person who is completing and signing this claim:

Name Anthony John Passanisi
First name Middle name Last name

Title President / CEO

Company Passanisi Investigations, Inc.
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address 4228 18th Street
Number Street

San Francisco CA 94114
City State ZIP Code

Contact phone (415) 703-9888 Email tony@passanisi.com

PASSANISI Investigations

Invoice

Date: 11/1/2019

Invoice No: 067655

Julie Probst
 Dwayne S. Beck & Associates, APC
 6830 Palm Avenue
 Riverside, CA 92506

RE: **Mendoza vs. Apex Parks...**
 Claim No: **19CECL01258**
 Our File No: **19-P20769**
 DOI: **11/1/2019**

Item	Description	Quantity	Rate	Amount
Investigation	October 29, 2019	0.5	85.00	42.50
Transportation	October 29, 2019	0.7	85.00	59.50
Mileage	October 29, 2019	23	0.65	14.95
Database Searches	October 29, 2019	1	51.00	51.00
DMV Fees	October 29, 2019	1	18.00	18.00
ANI	October 29, 2019	2	15.00	30.00
Plates	October 29, 2019	2	12.00	24.00
Investigation	October 30, 2019	1.08	85.00	91.80
Transportation	October 30, 2019	1.2	85.00	102.00
Mileage	October 30, 2019	49	0.65	31.85
Investigation	October 31, 2019	3	85.00	255.00
Transportation	October 31, 2019	0.7	85.00	59.50
Mileage	October 31, 2019	27	0.65	17.55
Report Writing	October 31, 2019	1.5	85.00	127.50

Total Due \$925.15

Submit Payment To:
 San Francisco Office

NET DUE - 15 DAYS

Passanisi Investigations
4228 Eighteenth Street
San Francisco, CA 94114

Please include the above invoice number
 with your payment. Thank you.

Balance Due	\$925.15
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PASSANISI Investigations

Invoice

Date: 12/2/2019

Invoice No: 067767

Julie Probst
Dwayne S. Beck & Associates, APC
6830 Palm Avenue
Riverside, CA 92506

RE: Mendoza vs. APEX Parks...
Claim No: 19CECL01258
Our File No: 19-P20769
DOI: 12/2/2019

Item	Description	Quantity	Rate	Amount
Investigation	November 20 - 23, 2019	3.2	85.00	272.00
Transportation	November 23, 2019	2.2	85.00	187.00
Mileage	November 23, 2019	122	0.65	79.30
Report Writing	November 23 - 25, 2019	1	85.00	85.00

Total Due \$623.30

Submit Payment To:
San Francisco Office

NET DUE - 15 DAYS

Passanisi Investigations
4228 Eighteenth Street
San Francisco, CA 94114

Please include the above invoice number
with your payment. Thank you.

Balance Due	\$623.30
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PASSANISI Investigations

Invoice

Date: 12/27/2019

Invoice No: 067866

Julie Probst
Dwayne S. Beck & Associates, APC
6830 Palm Avenue
Riverside, CA 92506

RE: **Mendoza vs. APEX Parks...**
Claim No: **19CECL01258**
Our File No: **19-P20769**
DOI: **12/27/2019**

Item	Description	Quantity	Rate	Amount
Investigation	December 19, 2019	0.98	85.00	83.30
Database Searches	December 20, 2019	1	51.00	51.00

Total Due \$134.30

Submit Payment To:
San Francisco Office

NET DUE - 15 DAYS

Passanisi Investigations
4228 Eighteenth Street
San Francisco, CA 94114

Please include the above invoice number
with your payment. Thank you.

Balance Due	\$134.30
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PASSANISI Investigations

Invoice

Date: 1/21/2020

Invoice No: 067957

Julie Probst
 Dwayne S. Beck & Associates, APC
 6830 Palm Avenue
 Riverside, CA 92506

RE: Mendoza vs. APEX Parks...
 Claim No: 19CECL01258
 Our File No: 19-P20769
 DOI: 1/21/2020

Item	Description	Quantity	Rate	Amount
Investigation	January 18, 2020	2.5	85.00	212.50
Transportation	January 18, 2020	0.6	85.00	51.00
Mileage	January 18, 2020	18	0.65	11.70
Report Writing	January 18, 2020	0.3	85.00	25.50

Total Due \$300.70

Submit Payment To:
 San Francisco Office

NET DUE - 15 DAYS

Passanisi Investigations
 4228 Eighteenth Street
 San Francisco, CA 94114

Please include the above invoice number
 with your payment. Thank you.

Balance Due	\$300.70
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